

Remarks

A. Pending Claims

Claims 1-4, 6-8, 10, 12-15, 17-22, 24, 29-34, 36, 38-46, 52-62, and 71 are pending. Claims 26-27 and 47-51 have been cancelled. Claims 1, 6, 13, 18, 32, and 40-42 have been amended.

B. The Claims Are Not Obvious over Borghesi in View of Richards Pursuant To 35 U.S.C. § 103(a)

The Examiner rejected claims 1, 2, 6-8, 12, 13, 17, 52-57, and 71 under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,950,169 to Borghesi et al. (hereinafter "Borghesi") in view of U.S. Patent No. 6,408,303 to Richards (hereinafter "Richards"). Applicant respectfully disagrees with these rejections.

To reject a claim as obvious, the Examiner has the burden of establishing a *prima facie* case of obviousness. *In re Warner et al.*, 379 F.2d 1011, 154 USPQ 173, 177-178 (CCPA 1967).

To establish a *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP § 2143.03. In addition, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Claim 1 has been amended for clarification. Support for the amendments to claims 1 may be found, for example, in Applicant's Specification on pages 18-21. Amended claim 1 describes a combination of features including, but not limited to:

automatically modifying the additional information read from the source fields using one or more of source-side functions;

automatically selecting one or more destination fields using pathways established in the generated map;

automatically adding the modified additional information to the one or more selected destination fields;

Applicant submits that the cited art, separately or in combination, does not appear to teach or suggest at least these features of claim 1, in combination with the other features of the claim.

Claim 13 has been amended for clarification. Applicant submits that the cited art, separately or in combination, does not appear to teach or suggest at least these features of claim 13, in combination with the other features of the claim.

Applicant submits that many of claims dependent on claims 1 and 13 are independently patentable. For example, claim 53 recites: “wherein at least one business rule comprises an administration system identifier.” The cited art does not appear to teach or suggest at least these features of claims 53, in combination with the other features of the claims.

Borghesi states:

Administrative information stored in the “ADMIN” tab includes several frames 108 of information accessible through the frame switching button bar 106 inside the tab. Preferably, the information comprises assignment information, inspection information, policy information, party information, statements, loss information, and repair site information. Assignment information includes items such as the claim number, the date the claim was reported, the date the claim was assigned, and information on who received the assigned claim, e.g., the names of the insurance company, appraiser and adjuster, as well as claim office location.
(Borghesi, column 9, lines 18-29)

The Office Action states: “policy number is equivalent to an administration system identifier”. Applicant respectfully disagrees with the Office Action’s position. The “policy number” disclosed in Borghesi does not appear to be an identifier for an administration system, but is instead information about an insurance policy. Borghesi does not appear to teach or suggest in

combination a business rule comprising an administration system identifier. Applicant respectfully requests removal of the rejection of this claim.

Regarding claims 40-44, the Office Action states:

The system generates a generic a claim processing workflow, specifically for automobile insurance claims (insurance pricing transaction, a commission settlement transaction), other type of insurance such as property (an annuity asset pricing transaction) or health insurance may also be mapped into the claim workflow. Also see column 5, lines 5-15, determine a vehicle valuation prior damage, salvage disposition (a positions and valuation focused refresh transaction). Therefore, *Borghesi does teach an annuity asset pricing transaction, a positions and valuation focused refresh transaction, an insurance pricing transaction, a commission settlement transaction.* [Emphasis in original].

Applicant respectfully disagrees with the Office Action's assertion that Borghesi teaches the transactions recited in claims 40-42. As used in the instant application, annuity asset pricing transactions, positions and valuation focused refresh transactions, and positions and valuation full refresh transactions relate to annuity contracts. As stated in Applicant's specification:

Positions and valuations full refresh (PVF) is a transaction involving the financial and non-financial information about an annuity contract at a particular point in time. The PVF includes contract data such as valuations, replacements, producer information, owner information, and payor information. Positions and valuations focused refresh (PFF) is also a transaction involving the financial and non-financial information about an annuity contract at a particular point in time. The PFF record is a shorter version of the PVF record and includes the data and value for each contract. Annuity asset pricing (AAP) is a transaction involving the pricing or unit value of the underlying variable investment funds supporting a contract.

(Specification, page 2, lines 21-29) (emphasis added).

The Office Action appears to take the position that Borghesi teaches generating an annuity asset pricing transaction because it describes a "claim processing workflow" for "other types of insurance such as property or health insurance" in addition to automobile insurance claims. Applicant respectfully disagrees with this position. Applicant submits that insurance claims relating to claims for loss of property are not annuity asset pricing transactions. As stated in Applicant's specification:

if the transaction is an annuity asset pricing (AAP) transaction, then the computer system for transaction processing is expected to tell the trading partner the pricing or unit values of the underlying investment funds supporting a contract. This pricing is required to calculate the dollar value of an annuity contract and financial transactions. Typically, the records are generated each business day and contain information for each investment fund used by a company.

(Specification, page 10, lines 15-21).

The Office Action also appears to take the position that “vehicle valuation prior damage, salvage disposition” is a positions and valuation focused refresh transaction. Applicant respectfully disagrees. As used in the instant specification, a position and valuation focused refresh transaction relates to management of annuity contracts, not vehicle valuation or disposition. Applicant submits that performing vehicle valuation of prior damage and salvage disposition is not a positions and valuation focused refresh transaction.

C. The Claims Are Not Obvious over Borghesi in View of Richards and Further in View of Hoover Pursuant To 35 U.S.C. § 103(a)

The Examiner rejected claims 3, 4, 14, 15, 18-22, 24, 26, 27, 32-34, 38-51, and 58-62 under 35 U.S.C. 103(a) as being unpatentable over Borghesi in view of Richards and further in view of U.S. Patent No. 5,724,575 to Hoover et al. (hereinafter “Hoover”). Applicant respectfully disagrees with these rejections.

Amended claims 1, 13, and 18 describe a combination of features including, but not limited to:

automatically modifying the additional information read from the source fields using one or more of source-side functions;

automatically selecting one or more destination fields using pathways established in the generated map;

automatically adding the modified additional information to the one or more selected destination fields;

With respect to this feature, the Office Action mailed February 7, 2005 states, in part, that Hoover, column 32, lines 50-67 and figure 8 teaches:

the EMPLOYEE_IDX allows determination of the relationship between employees, employers and persons; given an employee object identifier, and associated employer object identifier and person object identifier can be obtained, by reference to the EMPLOYEE_IDX table (or a map table), in this example, the source fields are "employer object identifier" and "person object identifier", the destination field is "employee object identifier", thus the value of destination field (the employee object identifier) is the function of two source fields (the employer object identifier and the person object identifier). Therefore, Hoover, does teach the value of the destination field is a sum of respective values of the one or more selected source fields, a value of the destination field as a function of the one or more source fields. [emphasis in original]

Applicant respectfully disagrees that Hoover teaches a value of the destination field that is a sum of values of selected source fields. Even if the employee object identifier could be considered a function of the employer object identifier and person object identifier (Applicant submits that it cannot), a value of the employee object identifier is not the sum of the employer object identifier and person object identifier.

Applicant further submits that Hoover does not appear to teach or suggest at least the feature of "modifying the additional information read from the source fields using one or more of source-side functions." The cited section of Hoover recites:

Prior to beginning the discussion, it will be recalled from the discussion above in connection with FIG. 8 that a junction table such as EMPLOYEE_IDX allows determination of the relationship between employees, employers, and persons. Given an employee object identifier, an associated employer object identifier and person object identifier can be obtained, by reference to the EMPLOYEE_IDX junction table.

In like manner, the VISIT_IDX table 130d is a junction table that allows the determination of the relationship between visits and persons. The VISIT_IDX table 130d in FIG. 8 relates person OBJIDs to providers OBJIDs and visit OBJIDs. Other information of interest in the VISIT_IDX table includes

admit_date, which attaches to a particular visit. Accordingly, it will be understood that given a particular person object identifier, person(OBJID), the visits associated with that person can be identified by consulting the VISIT_IDX table to obtain visit object identifiers visit(OBJID) containing detailed attributes associated with visits by that person to particular health care providers, which are identified by their provider(OBJID).

Applicant submits that Hoover does not appear to teach or suggest modifying the “employer object identifier” or the “person object identifier”. As such, Applicant submits that Hoover and the other cited art, taken alone or in combination, do not teach or suggest at least the above-quoted features of independent claims 1, 13, and 18, in combination with the other features of the independent claims. Applicant respectfully requests removal of the rejection of this claim.

D. Additional Remarks

Based on the above, Applicant submits that all claims are in condition for allowance. Favorable reconsideration is respectfully requested.

Applicant respectfully requests a three-month extension of time to respond to the Office Action dated February 7, 2005. A fee authorization form in the amount of \$1020.00 is enclosed for the extension of time fee. If any further extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-23300/EBM.

Respectfully submitted,



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